REMARKS

This Response is submitted in response to the Final Office Action dated November 2, 2006. Claims 1, 14-16, 18 and 24-25 have been amended. No new matter is added.

35 U.S.C. §112 Rejections

The Office Action rejects Claims 1, 3-8, 10-16, 18-20 and 22-25 under 35 U.S.C. §112, first paragraph, as failing to comply with the enablement requirement. The Office Action states that the claims contain subject matter which as not described in the specification in such a way as to enable one skilled in the art to which it pertains, or with which it is most nearly connected, to make and/or use the invention.

Specifically the Office Actions states that the specification does not adequately describe (a) how the communication manager detects the connection or disconnection to a network, (b) how a software installing means identifies a software module, (c) where the electronic device sending or receiving messages is, (d) what triggers the messages to be sent and (e) how the system knows to install or uninstall software. Applicants traverse such rejections.

As to point (a), how the communication manager detects the connection or disconnection to a network, see the specification on page 20. The specification states in part, "[a]n event manager is used for generating an event and sending it to another software module when the status of the network changes, such as when a new apparatus is connected to or disconnected from the network. Accordingly, in the network using the HAVi, plug-and-play can be implemented." Applicants respectfully submit that one of ordinary skill in the art would be able to make/and or use an event manager to determine network status.

As to point (b), how a software installing means identifies a software module, see the specification on pages 20-21. The specification states in part, "A registry stores or updates information concerning apparatuses... [b]y referring to the registry, each apparatus on the network is able to check where the basic software modules of the other apparatuses are located on the network." Applicants respectfully submit that one of ordinary skill in the art would be able to make and/or use a software registry to identify software modules.

As to point (c), where the electronic device sending or receiving messages is, see figures 18 and 19 and the specification page 35. The specification in describing one embodiment states,

"[t]he reader/writer 141 modulates a control signal for controlling the DVCR into a signal having a predetermined format, and outputs it from a loop antenna 151 as radio waves." See also the specification on page 34 discussing the IRD 2 in one embodiment which reads and writes information regarding the electronic guarantee card, performing both sending and receiving of electronic messages. Applicants respectfully submit that one of ordinary skill in the art would be able to make and/or use a reader/writer capable of sending or receiving messages based on the specification.

As to point (d), what triggers the messages to be sent, see the figures 8 and 9. Figures 8 and 9 show a flow chart illustrating message analyzing processing to be executed by an application, and depicts triggers for adding history and getting history. For example see step S36 stating "pressed button is repair-information input button" with the yes side leading to "send addHistory command to guarantee card FCM." Additionally the "pressed button is repaid-information display button", leads to "send getHistory command to guarantee card FCM." Applicants respectfully submit that one of ordinary skill in the art would be able to make and/or the appropriate triggers for sending or receiving messages.

As to point (e), how the system knows to install or uninstall software, see the specification on page 20. The specification states, "[o]n the network using the HAVi, when a new apparatus is connected to the network, the DCM manager installs the DCM, the DVCRFCM, and the guarantee card FCM corresponding to the new apparatus, and when an apparatus is disconnected from the network, the DCM manager uninstalls the DCM, the DVCRFCM, and the guarantee card FCM corresponding to the disconnected apparatus." Applicants respectfully submit that one of ordinary skill in the art would be able to make and/or use the appropriate triggering events to install or uninstall software based on the specification

For at least the foregoing reasons Applicants respectfully submit that Claims 1, 3-8, 10-16, 18-20 and 22-25 are in condition for allowance.

Additionally, the Office Action rejects Claims 1, 3-8, 10-16, 18-20 and 22-25 under 35 U.S.C. 112 second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicants regard as the invention.

Particularly, the Office Actions states that Claims 1, 3-8, 10-16, 18-20 and 22-25 do not clearly point out what function the software module is performing. Applicants respectfully disagree and traverse such rejection. Claim 1 reads, in part, "a software module used for writing and reading product history information which includes at least one of purchase information and repair information concerning said electronic apparatus." Independent Claims 14-16, 24 and 25 contain similar language. Therefore, Applicants submit that the function of the software module is clearly pointed out.

The Office Action also rejects Claims 1, 8, 14, 15 and 20 for failing to claim any function the structure is performing with the term "means." Applicants respectfully disagree and traverse such rejections.

Claims 1 states in part, "communication means **for managing a communication on said network.**" (emphasis added). The emphasized text is a proper function that the structure is performing. Similarly, Claim 1 states, "software module acquiring means **for acquiring, from said electronic apparatus, a software module used for writing and reading product history information.**" (emphasis added). Claim 1 also states, "software module installing means **for identifying the software module acquired by said software module acquiring means.**" (emphasis added). Claim 1 also states, "production-history updating means **for updating the product history information stored in said electronic apparatus.**" Similarly, Claims 8 and 20 state in part, "wherein said product history updating means comprises product-history input means **for inputting new product history information.**" Applicants respectfully submit that the claim language for Claims 1, 8 and 20 properly claim functions that the structure is performing, and therefore are in condition for allowance.

Claims 14 and 15 have been amended to traverse said rejection. Claim 14 now reads in part, "wherein said software module acquiring ~~means~~ step acquires said software module when said communication management ~~means~~ step detects that said electronic apparatus is connected to said network." Claim 15 contains similar language. Applicants respectfully submit that Claims 14 and 15 are in condition for allowance.

35 U.S.C. §102 Rejections

The Office Action rejects Claims 1, 3-8, 12-16, 18-20 and 22-25 under 35 U.S.C. § 102(e) as being anticipated by Suliman (US Patent Applicants No. 2001/0053980). Applicants respectfully disagree and traverse such rejections.

Applicants respectfully submit that independent Claims 1, 14-16 and 24-25 have been amended and the amendments traverse such rejections in the spirit of cooperation and expediting allowance of same. No new matter is added. Claim 1 now reads in part, "communication management means for managing a communication on said a home network system." The amendment is fully supported by the specification. For example, see the specification on page 14 stating in part, "a home network system configured in accordance with an embodiment of the present invention is formed of an IRD 2 and a DVCR 3."

The reference Suliman does not disclose or suggest all of the elements of the claimed invention. The reference Suliman requires a connection to a global communications network. For example, see the reference Suliman in paragraph 11, stating "[t]he registration system is interconnected to a global communications network … the term 'global communications network' refers to any globally accessible communications network, such as for example the World Wide Web." Requiring connection to a global communications network presents a number of different problems, for instance security and the lack of access to such a global communications network by consumers. The claimed invention has no such limitation, and will work without a connection to a global communications network.

Additionally, the system disclosed by Suliman requires user registration. For example, see the reference Suliman in paragraph 12 stating that, "[t]he consumer, after setting up an account with the registration system, can upload the product information to the registration system." Registration also requires additional security and input by the consumer.

The claimed invention requires no such registration. Claim 1 states, "product-history updating means for updating the product history information stored in said electronic apparatus by sending messages for reading/writing the product history information to said electronic apparatus via said home network system and receiving responses to said messages from said electronic apparatus." Therefore, the product history is updated without the requirement of user registration saving time and being more secure to the user.
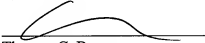
For at least the foregoing reason Applicants respectfully submit that Claims 1, 14-16 and 24-25, and Claims 3-8, 12-13, 18-20 and 22-23 t hat depend therefrom, are patentably distinguishable and in condition for allowance.

The Commissioner is hereby authorized to charge deposit account 02-1818 for any fees which are due and owing.

Respectfully submitted,

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